

Rick Hoffman
FEDERAL DEFENDERS OF EASTERN WASHINGTON AND IDAHO
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Attorneys for Defendant
KENNETH ROWELL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
(HONORABLE WM. FREMMING NIELSEN)

TO: MICHAEL C. ORMSBY, UNITED STATES ATTORNEY
ALEXANDER C. EKSTROM, ASSISTANT UNITED STATES ATTORNEY

COMES NOW the defendant, KENNETH ROWELL, and moves the court for an order to reopen the detention hearing to reconsider his conditions of release pending trial.

Defendant, Kenneth Rowell has previously had a detention hearing, on December 9, 2013, at which time the Court ordered defendant's continued detention. At that time, the defense did not have a formal release plan for

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1 the Court's consideration and believes that a plan has now been formulated
2 such that the Court should reconsider the defendants release on conditions.

3 Mr. Rowell would propose that he be released to live at his parents
4 residence, 4709 Hilltop Drive, Pasco, Washington. Mr. Rowell's parents have
5 confirmed that he can live there and that they would comply with any
6 conditions imposed by the Court, including providing transportation to and
7 from court and attorney visits, as required. In addition, Mr. Rowell has been
8 offered employment with his father's business, H A Rowell Auctioneering.
9 As such, Mr. Rowell would be under the direct supervision of his father,
10 Harold Rowell, who has indicated that he would comply with any condition
11 regarding employment as imposed by the Court. Both of Mr. Rowell's
12 parents have indicated that they would notify the court and/or probation if
13 Mr. Rowell was unable or unwilling to comply with any condition imposed
14 upon him by the Court.

17 In addition to residential and employment conditions as proposed
18 above, Mr. Rowell is willing to comply with additional conditions, if imposed,
19 such as electric monitoring and treatment requirements.

20 Mr. Rowell suggests that there are conditions that could be imposed by
21 the Court to insure that he remain in the Eastern District of Washington and

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1 attend all court proceedings and also would insure the safety of the
2 community. Therefore, Mr. Rowell requests that the Court reconsider his
3 release status.

4 DATED: December 13, 2013.

5 Respectfully Submitted,

6
7 s/Rick L. Hoffman
8 Rick L. Hoffman, 9478
9 Attorney for KENNETH ROWELL
10 Federal Defenders of Eastern
11 Washington and Idaho
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17 CERTIFICATE OF SERVICE

18
19 I hereby certify that on December 13, 2013, I electronically filed the
20 foregoing with the Clerk of the Court using the CM/ECF System which will
21 send notification of such filing to the following: ALEXANDER C. EKSTROM,
22 Assistant United States Attorney.

23
24 s/Rick L. Hoffman

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